Washington Office Hazard Communication Program (EMPLOYEE RIGHT-TO-KNOW)

I. GENERAL:

On November 25, 1983, the Occupational Safety and Health Administration (OSHA) placed in effect the requirements of 29 CFR 1910.1200, Hazard Communication Standard. To comply with this standard, the Bureau of Land Management Washington Office (WO) shall implement the Hazard Communication Program (HCP) for the protection of its employees.

Phyllis McKoy, WO Safety Officer, will keep the originals on file. She is located in Room 2044, Main Interior Building.

Supervisors will be responsible for ensuring the program is enforced.

A copy of this program is to be made available to any WO employee upon request. Contact Ms. McKoy at 501-2788 to obtain a copy of this program. The WO Safety Officer with assistance from the supervisors/group managers will also review the HCP annually for completeness and accuracy.

II. PURPOSE:

To provide guidance and direction to WO employees, contractors, and volunteers who use, or maybe exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies.

III. RESPONSIBILITIES:

The <u>Assistant Director--Human Resources Management</u> is responsible for the overall implementation of the HCP in the WO.

Supervisors/Group Managers are responsible for:

- -- Informing their employees about the existence of the HCP,
- -- Taking an inventory of hazardous chemicals used and stored in their work area,
- -- Identifying the hazardous chemicals in their respective work areas,
- -- Ensuring that hazardous chemicals are properly labeled,
- -- Ensuring that non/less hazardous chemicals are considered for the job before a hazardous chemical is purchased,
- -- Obtaining copies of Material Safety Data Sheets (MSDS), when ordering hazardous chemicals (Bankcard/Purchase Request),

Attachment 1-1

- -- Contacting the manufacturer or supplier of hazardous chemicals if the MSDS was not provided with the shipment,
- -- Posting in their work area the MSDSs where the hazardous chemicals are used or stored,
- -- Providing a copy of their inventory lists and MSDSs to the WO Safety Officer,
- -- Notifying the Safety Officer of any work done by contract,
- -- Ensuring that the proper protective equipment is available,
- -- Enforcing the proper use of protective equipment and established safety procedures, and
- -- Providing hazard communication and hazard-specific training to employees.

The WO Safety Officer is responsible for:

- -- Developing and maintaining the WO HCP,
- -- Maintaining a file of all WO MSDS and hazardous chemicals inventory lists,
- -- Assisting supervisors, upon request, in providing the required training,
- -- Providing employees and supervisors with the right information on the hazardous properties of chemicals as requested.

Requisitioners and credit card holders are responsible for:

- -- Identifying hazardous materials/chemicals on requisitions, with assistance from their supervisor/group manager, hazardous materials coordinator, or safety officer,
- -- Advising vendors of labeling and MSDS requirements when they place verbal orders or use their credit cards.

Contracting Officers are responsible for:

- -- Including labeling and MSDS requirements in purchase orders and contracts,
- -- Advising vendors of labeling and MSDS requirements when they place verbal orders or use their credit cards,
- -- Ensuring that receiving copies of orders include the MSDS requirements.

Receiving Officers are responsible for:

-- Routing MSDSs to the safety officer and the supervisor/group manager who ordered hazardous chemical/material.

All <u>WO Employees</u> are responsible for:

- -- Performing assigned tasks in a safe manner,
- -- Notifying his/her supervisor immediately of any safety hazards or injuries,
- -- Understanding the properties of the chemicals with which they will work and to follow all precautions that apply.

IV. CONTAINER LABELING:

The Property, Acquisition & Headquarter Services Group (WO-850) will be responsible for all containers of hazardous chemicals entering the workplace and will assure that the containers are properly labeled with:

- a. Chemical name
- b. Hazard warning, and
- c. Name and address of the manufacturer, importer, or responsible party.

V. MATERIAL SAFETY DATA SHEET (MSDS):

The supervisor/group manager will be responsible for obtaining a copy of the MSDS when purchasing a hazardous chemical. Requisitions submitted for purchase of products shall include a statement such as "MSDS REQUIRED WITH DELIVERY" before being processed. If using a Bankcard to purchase a hazardous chemical, a copy of the MSDS must be requested. Any supervisor needing assistance in obtaining a MSDS should contact the WO Safety Officer.

New hazardous chemicals entering the workplace shall not be used until a MSDS has been obtained.

The supervisor/group manager or receiving officer will provide the WO Safety Officer, with a copy of the MSDS. The Safety Officer will review the data sheets for health and safety concerns and ensure that the information is provided to affected employees as required. The Safety Officer will also maintain a central file of MSDS for the WO.

For additional information, refer to BLM policy 1510, Acquisition Manual regarding Material Safety Data Sheets.

VI. INVENTORY OF HAZARDOUS CHEMICALS:

The WO Safety Officer will maintain the submitted inventory lists of the hazardous chemicals used in the BLM--WO occupied buildings. The WO Safety Officer will update the inventory as new hazardous chemicals are introduced into the workplace.

Supervisors/group managers will notify the Safety Officer of all new hazardous chemical purchases and provide the Safety Officer with a copy of the MSDS to maintain this inventory listing. This action is critical to keep the HCP current.

VII. EMPLOYEE TRAINING AND INFORMATION:

The supervisor/group manager is responsible for going over the HCP and MSDS applicable to their work area with all of his/her employees. They can contact the WO Safety Officer for assistance in accomplishing this responsibility. In addition, supervisors/group managers are responsible for providing employee training and information.

The minimum orientation and training (discussion and/or videotape) should include the following:

- -- An overview of the Hazard Communication Standard, 29 CFR 1910.1200,
- -- Hazardous materials present in the workplace,
- -- Location and availability of the HCP,
- -- Physical and health effects of the hazardous materials listed on the chemical inventory list,
- -- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area,
- -- Emergency procedures to follow if exposed to the physical or chemical hazard, and
- -- Location of MSDS file and location of the inventory list for the hazardous materials.

The BLM National Training Center in Phoenix provides classroom and video instruction on Chemical Management, Hazard Recognition, Hazard Communication, and other related topics. Supervisors/group managers and employees are encouraged to receive training in these areas.

VIII. NON-ROUTINE TASKS:

No non-routine tasks are performed in the workplace.

IX. OTHER PERSONNEL EXPOSURE (CONTRACTORS):

It is the responsibility of the Group Manager/Supervisor or Contracting Officers' representative to inform the WO Safety Officer of any work done by contract. The Safety Officer will provide other personnel or outside contractors with the following information as follows:

- -- hazardous chemicals they may be exposed to while in the workplace,
- -- measures to lessen the possibility of exposure,
- -- location of MSDS for all hazardous chemicals, and
- -- procedures to follow if they are exposed.

In addition, the Safety Officer will be responsible for contacting each contractor before work is started to gather and disseminate any information concerning hazardous chemicals the contractor may bring into the workplace.